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COUNTY OF BUTTE, STEPHANIE BRAZIL, SARAH CORNETT, DEPUTY PANUKE and DEPUTY

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*Exempt from Filing Fee Pursuant to Government Code section 6103*

**UNITED STATES DISTRICT OF CALIFORNIA  
EASTERN DISTRICT OF CALIFORNIA**

The minor, M.B., by and through her guardian  
*ad litem* Brett Brashears,

Plaintiff,

vs.

Butte County, a public entity; Stephanie  
Brazil, an individual; Sarah Cornett, an  
individual; Deputy Panuke, an individual;  
Deputy Michael Keating, an individual; Youth  
& Family Programs Foster Family Agency, a  
California corporation; Eugene C. Hastings,  
and individual; and Does 1 Through 10,  
inclusive,

Defendants.

**No. 2:23-cv-1977 DAD DB**

**JOINT STIPULATION AND ORDER TO  
CONTINUE TRIAL AND PRETRIAL  
DEADLINES**

Complaint filed: 9/13/2023

IT IS HEREBY STIPULATED, by and between the parties through their counsel of record:

1. On January 23, 2024, the Court issued a Scheduling Order in this matter, setting a trial date and pretrial deadlines. (*See* ECF No. 20, Scheduling Order.)
2. The parties have exchanged Initial Disclosures in this matter.
3. On or about January 25, 2024, Plaintiff served Plaintiff's Request for Production of Documents, Set One, on Defendant County of Butte ("the County"), seeking Plaintiff's juvenile case file and other information deemed confidential under California Welfare and Institutions Code section 827. On or about February 24, 2024, Plaintiff served Plaintiff's Request for Production of Documents, Set Two, on the County.
4. After Plaintiff served the requests discussed above in paragraph 3, the parties began meeting and conferring regarding a stipulation and protective order allowing the parties to exchange information in federal court which was otherwise confidential pursuant to California Welfare and Institutions Code section 827, including Plaintiff's juvenile case file and confidential criminal records. On April 4, 2024, the parties filed a Stipulation and Proposed Order allowing disclosure of the information in federal court. (*See* ECF No. 23, Stipulation and Proposed Protective Order.)
5. On April 9, 2024, the Court signed an order authorizing the parties to exchange information and documents which is otherwise confidential under California Welfare and Institutions Code section 827. (*See*, ECF No. 24, Stipulation and Protective Order.)
6. Pursuant to the Court's Protective Order (ECF No. 24), the deadline for the County to respond to Plaintiff's outstanding discovery requests is July 8, 2024, or 90 days after the Court signed the Stipulation and Protective Order.
7. The County is diligently working to obtain all records responsive to Plaintiff's written discovery requests, so that it may produce the records on or before the July 8, 2024, deadline.
8. Counsel for Plaintiff and the County have met and conferred regarding the current Scheduling Order and agree that there is good cause to continue the current trial date and pretrial deadlines by 90 days, so there is time for the parties to conduct additional necessary discovery, such as depositions, after the County responds to Plaintiff's written discovery requests. The parties are unable to meaningfully conduct this discovery until after the juvenile file and other confidential records are produced. There have been no prior requests to continue these deadlines.

9. Given the foregoing, the parties have agreed to the extend the current deadlines as follows, subject to the Court's availability and approval:

	<b>Current Date</b>	<b>Proposed New Date</b>
<b>Close of Fact Discovery</b>	October 25, 2024	January 23, 2025
<b>Expert Witness Disclosure</b>	November 22, 2024	February 10, 2025
<b>Disclosure of Rebuttal Experts</b>	December 20, 2024	March 20, 2025
<b>Close of Expert Discovery</b>	January 24, 2025	April 24, 2025
<b>Dispositive Motion Filing Deadline</b>	March 14, 2025	June 12, 2025
<b>Final Pretrial Conference</b>	August 26, 2025, at 1:30 p.m.	November 24, 2025, at 1:30 p.m.
<b>Trial</b>	November 3, 2025, at 9:00 a.m.	February 2, 2026, at 9:00 a.m.

**IT IS SO STIPULATED.**

Date: April 29, 2024

PORTER | SCOTT  
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By /s/ Alison J. Southard  
William E. Camy  
Alison J. Southard  
Attorneys for COUNTY OF BUTTE, STEPHANIE  
BRAZIL, SARAH CORNETT, DEPUTY  
PANUKE and DEPUTY MICHAEL KEATING

Date: April 30, 2024

THE LAW OFFICES OF SHAWN A. MCMILLAN, APC

By /s/ Shawn A. McMillan  
Shawn A. McMillan  
Stephen D. Daner

Date: April 30, 2024

FRIEDENTHAL, HEFFERNAN & BROWN, LLP

By /s/ Daniel R. Friedenthal  
Daniel R. Friedenthal

**ORDER**

Pursuant to the stipulation of the parties, and good cause appearing therefore, **IT IS HEREBY ORDERED** as follows:

1. The present Scheduling Order is Amended to read as follows:

- a. Close of Fact Discovery: January 23, 2025
- b. Expert Witness Disclosure: February 10, 2025
- c. Disclosure of Rebuttal Experts: March 20, 2025
- d. Close of Expert Discovery: April 24, 2025
- e. Dispositive Motion Filing Deadline: June 12, 2025
- f. Deadline to File Joint Pre-Trial Statement: November 17, 2025  
(Seven Days Before Pre-Trial Conference)
- g. Final Pre-Trial Conference: November 25, 2025, at 1:30 p.m.
- h. Jury Trial: February 2, 2026, at 9:00 a.m.

**IT IS SO ORDERED.**

DATED: May 2, 2024

/s/ DEBORAH BARNES

UNITED STATES MAGISTRATE JUDGE